

Joseph D. Pizzurro (JP-0124)
 Robert J. Gruendel (RG-8021)
 Dora Straus (DS-8079)
 CURTIS, MALLET-PREVOST,
 COLT & MOSLE LLP
 101 Park Avenue
 New York, NY 10178
 Tel: (212) 696-6000
 Fax: (212) 697-1559

*Attorneys for Defendants
 Apex Oil Company, Inc., Crest Tankers,
 Inc., Mathiasen's Tanker Industries, Inc., and
 Trinidad Corporation*

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----	X	
AMERICAN STEAMSHIP OWNERS MUTUAL	:	
PROTECTION AND INDEMNITY	:	No. 04-cv-04309 (LAK)(JCF)
ASSOCIATION, INC.	:	
	:	(ECF Case)
Plaintiff,	:	
-against-	:	
	:	
ALCOA STEAMSHIP CO., INC., et al.,	:	
	:	
Defendants.	:	
-----	X	

**OPPOSITION TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER
 BY DEFENDANTS APEX OIL COMPANY, INC., MATHIASEN'S TANKER
 INDUSTRIES, INC., TRINIDAD CORPORATION AND CREST TANKERS, INC.**

Defendants Apex Oil Company, Inc., Mathiasen's Tanker Industries, Inc.,
 Trinidad Corporation and Crest Tankers, Inc. adopt and incorporate by reference the arguments
 and authorities in opposition to plaintiff's motion for a protective order set forth in the
 memoranda of law submitted by defendants Keystone Shipping Co. *et al.* and Farrell Lines, Inc.

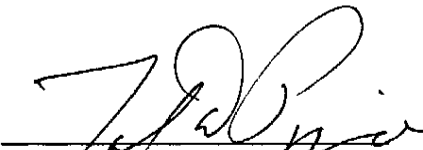
For all of the reasons set forth therein, plaintiff's motion for a protective order should be denied.

Dated: New York, New York
June 10, 2005

Respectfully submitted,

CURTIS, MALLET-PREVOST
COLT & MOSLE LLP

By:



Joseph D. Pizzurro (JP-0124)
Robert J. Gruendel (RG-8021)
Dora Straus (DS-8079)

101 Park Avenue
New York, New York 10178-0061
(212) 696-6000

*Attorneys for Defendants
Apex Oil Company, Inc., Crest Tankers,
Inc., Mathiasen's Tanker Industries, Inc.,
and Trinidad Corporation*